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13 VERIGY US, INC.  
14

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN JOSE DIVISION

18 VERIGY US, INC, a Delaware Corporation

19 Plaintiff,

20 vs.

21 ROMI OMAR MAYDER, an individual;  
22 WESLEY MAYDER, an individual; SILICON  
23 TEST SYSTEMS, INC., a California Corporation;  
24 and SILICON TEST SOLUTIONS, LLC, a  
25 California Limited Liability Corporation,  
26 inclusive,

27 Defendants.  
28

Case No. C07 04330 RMW (HRL)

**DECLARATION OF MELINDA M.  
MORTON IN SUPPORT OF PLAINTIFF'S  
ADMINISTRATIVE MOTION FOR  
LEAVE TO FILE DOCUMENTS UNDER  
SEAL**

Judge: Honorable Ronald M. Whyte  
Ctrm: 6

1 I, Melinda M. Morton, declare as follows:

2 1. I am an attorney licensed to practice law before all of the courts of the State of  
3 California. I am an associate with the law firm of Bergeson, LLP, counsel of record for Plaintiff  
4 Verigy US, Inc. ("Verigy" or "Plaintiff") in the above-captioned action. I have personal  
5 knowledge of the facts set forth in this declaration, and, if called to do so, I could and would  
6 competently testify thereto.

7 2. I submit this declaration in support of Verigy's Administrative Motion for Leave to  
8 File Document Under Seal.

9 3. I have reviewed the following materials ("the Materials"):

10 a. Portions of Plaintiff's Reply Memorandum of Points and Authorities in  
11 Support of the Application for an Order to Show Cause Re: Contempt  
12 Against Defendants Romi Mayder and Silicon Test Systems, Inc.

13 b. Exhibits 3, 4, 9, and 10 of the Reply Declaration of Michael W. Stebbins in  
14 Support of the Application.

15 4. I have determined that these Materials (hereafter "the Materials") disclose  
16 information that has been designated as "Highly Confidential—Attorneys' Eyes Only" or  
17 "Confidential" by the parties under the protective order, without objection to those designations  
18 (although Verigy reserves its rights to challenge such designations pursuant to the Stipulated  
19 Protective Order).

20 5. The confidentiality interest of the parties therefore overcomes the right of public  
21 access to the record, as a substantial probability exists that the parties' overriding confidentiality  
22 interest will be prejudiced if the record is not sealed. Further, the proposed sealing is narrowly  
23 tailored and no less restrictive means exist to achieve this overriding interest.

24 I declare under penalty of perjury under the laws of the United States of America that the  
25 foregoing is true and correct and that this declaration was executed this 28th day of March, 2008 at  
26 San Jose, California.

27  
28 /s/

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Melinda M. Morton